

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION CORPORATION, Plaintiff-Applicant, v. BERNARD L. MADOFF INVESTMENT SECURITIES LLC, Defendant.	Adv. Pro. No. 08-01789 (CGM) SIPA LIQUIDATION (Substantively Consolidated)
In re BERNARD L. MADOFF, Debtor.	Adv. Pro. No. 10-04468 (CGM)
IRVING H. PICARD, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC, Plaintiff, v. KEN-WEN FAMILY LIMITED PARTNERSHIP; KENNETH W. BROWN, in his capacity as a General Partner of the Ken-Wen Family Limited Partnership; and WENDY BROWN, in her capacity as a General Partner of the Ken-Wen Family Limited Partnership, Defendants.	

**DECLARATION OF
MATTHEW B. GREENBLATT, CPA/CFF, CFE**

I, Matthew B. Greenblatt, declare under penalty of perjury:

1. I am a Senior Managing Director in the Forensic and Litigation Consulting practice of FTI Consulting, Inc. (“FTI”). I have been retained as an expert witness in the above-captioned adversary proceeding (“Adversary Proceeding”) on behalf of Irving H. Picard (“Trustee”), trustee for the substantively consolidated liquidation of the business of Bernard L. Madoff Investment

Securities LLC (“BLMIS”) under the Securities Investor Protection Act (“SIPA”), 15 U.S.C. §§ 78aaa–*III*, and the chapter 7 estate of Bernard L. Madoff (“Madoff”). I submit this declaration in support of the Trustee’s (I) Opposition to Defendant Kenneth W. Brown’s Motion for Summary Judgment, (II) Cross Motion for Summary Judgment as to Defendant Kenneth W. Brown, and (III) Motion for Summary Judgment as to Defendant Ken-Wen Family Limited Partnership in this Adversary Proceeding.

2. I have more than 25 years of accounting industry experience including: auditing and accounting matters; litigation consulting; forensic accounting and internal investigations; post acquisition and shareholder disputes; anti-money laundering; and advising troubled companies.

3. I received a Bachelor of Science degree in Accounting from Lehigh University. I am a Certified Public Accountant (“CPA”), Certified in Financial Forensics (“CFF”), and a Certified Fraud Examiner (“CFE”). I am also a member of the American Institute of Certified Public Accountants, the New York State Society of Certified Public Accountants, and the Association of Certified Fraud Examiners.

4. Attached as **Attachment A** is a true and accurate copy of my expert report, titled Methodology for the Principal Balance Calculation (and exhibits), dated November 15, 2012 (the “Greenblatt Report”). I hereby incorporate by reference the contents of the Greenblatt Report as my sworn testimony as if fully set forth herein.

5. A true and accurate description of my background and qualifications is set forth in the Greenblatt Report ¶¶ 1-3.

6. I further describe my retention in this matter in the Greenblatt Report ¶¶ 4-9.

7. The findings, statements, conclusions, and opinions rendered in the Greenblatt Report and the bases for each are detailed in various sections of the Greenblatt Report, including

but not limited to ¶¶ 10-56, which identify the (a) methodology that I employed and/or supervised in connection with the analyses performed, and (b) sources of information and data that form the basis of my findings, conclusions and opinions.

8. Attached as **Attachment B** is a true and correct copy of my expert report, titled Principal Balance Calculation as Applied to the Ken-Wen Family Defendants (and exhibits), dated February 3, 2020 (the "Greenblatt Ken-Wen Report"). I hereby incorporate by reference the contents of the Greenblatt Ken-Wen Report as my sworn testimony as if fully set forth herein.

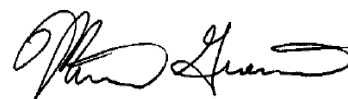
9. The findings, statements, conclusions, and opinions rendered in the Greenblatt Ken-Wen Report and the bases for each are detailed in various sections of the Greenblatt Ken-Wen Report, including but not limited to ¶¶ 2-22, which identify the (a) methodology that I employed and/or supervised in connection with the analyses performed, (b) sources of information and data that form the basis of my findings, conclusions and opinions, and (c) description of the activity in the Ken-Wen BLMIS Account and the Principal Balance Calculation.

10. Attached as **Attachment C** is a true and correct copy of my curriculum vitae, which includes a listing of the publications I have authored in the past ten years and a listing of the matters on which I have testified over the past four years.

11. I affirm that the findings, statements, conclusions, and opinions in the Greenblatt Report, Greenblatt Ken-Wen Report, and in this Declaration are truthful at the time given and continue to be true and accurate.

I declare under penalty of perjury that the foregoing is true and correct, pursuant to 28 U.S.C. § 1746.

Dated: December 1, 2021



Matthew B. Greenblatt, CPA/CFF, CFE